IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

ADAM C. BROCK PLAINTIFF

VS. CIVIL ACTION NO.: 3:14-cv-00465(WHB)(RHW)

VALLEY SERVICES, INC.

DEFENDANT

UNOPPOSED MOTION FOR EXTENSION OF TIME

COMES NOW Defendant Valley Services, Inc. ("Defendant"), and moves the Court for an extension of time by which to answer or otherwise plead to the Plaintiff's Complaint. In support of this Motion, the Defendant would show unto the Court as follows:

- 1. Defendant was served with this lawsuit on or about July 3, 2014, thereby making a response due on or about July 23, 2014. The Court later extended that deadline to August 6, 2014.
- 2. Due to prior obligations and time constraints, Defendant cannot prepare a response within the time required by law.
- 3, Defendant requests a two week extension of time by which to answer or otherwise plead to Plaintiff's Complaint, thereby making a response due on or before August 20, 2014
- 4. Plaintiff's counsel has been contacted and states he has no objection to this extension of time.
- 5. This Motion is not being made for the purpose of delay and the Plaintiff will not be prejudiced by such an extension.

WHEREFORE, PREMISES CONSIDERED, Defendant requests an extension of time by which to answer or otherwise plead to Plaintiff's Complaint until August 20, 2014

THIS, the 6th day of August, 2014.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ Saundra Strong

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ATTORNEYS FOR VALLEY SERVICES, INC., DEFENDANT

CERTIFICATE OF SERVICE

I, SAUNDRA STRONG, the undersigned attorney for VALLEY SERVICES, INC., do hereby certify that I have this date electronically filed the foregoing *UNOPPOSED MOTION*FOR EXTENSION OF TIME with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Louis H. Watson, Jr., Esquire Nick Norris, Esquire WATSON & NORRIS, PLLC 1880 Lakeland Drive, Suite G Jackson, Mississippi 39216-4972 Telephone: (601) 968-0000 louis@watsonnorris.com nick@watsonnorris.com

SO CERTIFIED, this the 6th day of August, 2014.

/s/ Saundra Strong

SAUNDRA STRONG